

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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RACHEL BORST,

Plaintiff,

Docket #17 cv 3041 (RRM)(CLP)

- against -

NEW YORK CITY DEPARTMENT OF EDUCATION,
CARMEN FARINA, CHANCELLOR, all sued in their
individual and official capacities,

Defendants.
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I, Jonathan B. Behrins, having personal knowledge of the facts below, declare the truth of
the following under the penalty of perjury pursuant to 28 U.S.C. §1746:

1. I am a member of the Behrins Law Firm PLLC, attorneys for the plaintiff, Rachel Borst.
2. I submit this declaration in opposition to the defendant's motion to dismiss.
3. I declare under the penalty of perjury that the information contained in the accompanying
memorandum of law is true and correct to the best of my knowledge.

WHEREFORE, it is respectfully requested that the relief sought in the defendants'
motion to dismiss be denied in its entirety, together with such other and further relief as the
Court deems just and proper.

Executed on November 5, 2018

/s/ Jonathan B. Behrins
JONATHAN B. BEHRINS